

EXHIBIT F

Deposition Transcript of Anita Serrano

Anita Serrano ~ January 8, 2021

* * * Confidential Remote Videoconference Deposition * * *

Page 1

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3
4 MICHELE LEUTHAUSER,

5 Plaintiff,

6 vs.

7 UNITED STATES OF AMERICA; and
8 UNKNOWN TRANSPORTATION SECURITY
ADMINISTRATOR OFFICER.

9 Defendants.
10 _____
11
12
13
14

)
) **CONFIDENTIAL**
)
)

) CASE NO.
) 2:20-cv-00479-JCM-VCF

)
) **CONDENSED**
) **TRANSCRIPT**
)

15 * * * CONFIDENTIAL * * *

16 REMOTE VIDEOCONFERENCE DEPOSITION OF ANITA SERRANO

17 Taken by Plaintiff

18 Taken on Friday, January 8, 2021

19 At 8:54 a.m.

20 At All-American Court Reporters

21 1160 North Town Center Drive, Suite 300

22 Las Vegas, Nevada
23
24

25 REMOTELY REPORTED BY: CINDY MAGNUSSEN, RDR, CCR NO. 650

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2 (Pages 2 to 5)

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES: 2 For Plaintiff: 3 JONATHAN CORBETT, ESQ. 4 (Present Via Videoconference) 5 Law Office of Jonathan Corbett 6 958 North Western Avenue 7 Suite 765 8 Hollywood, California 90029 9 (310) 684-3870 10 11 For Defendants: 12 BRIANNA SMITH, ESQ. 13 (Present Via Videoconference) 14 Assistant United States Attorney 15 501 South Las Vegas Boulevard 16 Suite 1100 17 Las Vegas, Nevada 89101 18 (702) 388-6336 19 20 Also Present Via Videoconference: 21 Cynthia Galvan, Zoom Host 22 All-American Court Reporters 23 24 Krista Maizel, Esq. 25 Transportation Security Administration Also Present Telephonically: Magistrate Judge Cam Ferenbach</p> <p style="text-align: center;">EXAMINATION</p> <p>WITNESS: PAGE Anita Serrano Examination by Mr. Corbett 4 EXHIBITS (None Offered)</p>	<p style="text-align: right;">Page 4</p> <p>1 EXAMINATION 2 BY MR. CORBETT: 3 Q. Okay. So Ms. Smith -- sorry. Ms. Serrano, am I 4 pronouncing your name correctly? Anita Serrano? 5 A. That's correct. 6 Q. Great. Have you ever taken a deposition before 7 this? 8 A. No. 9 Q. Okay. Before we start, I'd just like to remind 10 you that this is a proceeding that is under oath. It is 11 equivalent to you being on the witness stand in a real 12 courtroom in front of a jury and a judge, and the 13 information that you provide can be used as evidence 14 during the trial, just as statements you might make on a 15 witness stand. Do you understand that part? 16 A. I do. 17 Q. Great. 18 For the record, and just so we can make sure 19 we have identified the right person, I'm going to ask 20 you to describe yourself. 21 Some of these questions might seem obvious, 22 but can you state your gender first? 23 A. Female. 24 Q. Your age? 25 A. Thirty-eight.</p>
<p style="text-align: right;">Page 3</p> <p>1 LAS VEGAS, NEVADA; JANUARY 8, 2021 2 8:54 A.M. 3 -oOo- 4 P R O C E E D I N G S 5 ZOOM HOST: The attorneys participating 6 in this proceeding acknowledge that the court reporter 7 is not physically present in the proceeding room with 8 the deponent or counsel and that she will be reporting 9 this proceeding remotely. 10 Counsel, if you are in agreement to the remote 11 deposition, please state your name and consent to the 12 agreement for the record, then the court reporter, Cindy 13 Magnussen, CCR Number 650, will swear in the deponent 14 remotely. 15 MR. CORBETT: Hello. Jonathan Corbett, 16 for plaintiff, consents. 17 MS. SMITH: Good morning. Brianna Smith. 18 We consent. 19 Thereupon-- 20 ANITA SERRANO, 21 was called as a witness, and having been first duly sworn, 22 was examined and testified as follows: 23 MR. CORBETT: May I proceed? Court 24 reporter, are we good to proceed? 25 THE COURT REPORTER: Yes.</p>	<p style="text-align: right;">Page 5</p> <p>1 Q. Would you say you're average, more than average, 2 less than average weight? 3 A. I don't know what constitutes average weight. 4 Q. Or just describe in your own terms your build. 5 A. Average. 6 Q. Okay. Your skin tone, is it light? Fair? 7 Dark? 8 A. Fair. 9 Q. And your hair color? 10 A. Somewhere in the middle between dark and medium. 11 Q. Okay. And was your hair that color all 2019? 12 A. Yes. 13 Q. Okay. We're here because of an incident that 14 happened at an airport with TSA. Is it correct that you 15 were an employee with TSA on June 30th, 2019? 16 A. Yes. 17 Q. What was the start date for your employment? If 18 you don't remember the exact date, a month and year would 19 be okay. 20 A. It was December 12th, 2016. 21 Q. When you started with the TSA, were you given 22 any kind of training? 23 A. Yes. 24 Q. Can you briefly describe the duration and the 25 subject matter of your training?</p>

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<p>1 A. There was about --</p> <p>2 MS. MAIZEL: I'd like to object. This is</p> <p>3 Krista Maizel. Ms. Serrano, just a second, please.</p> <p>4 This is Krista Maizel on behalf of the</p> <p>5 Transportation Security Administration. I'm going to</p> <p>6 object to the extent that the response calls for or</p> <p>7 contemplates the disclosure of sensitive security</p> <p>8 information.</p> <p>9 I will instruct Ms. Serrano not to answer</p> <p>10 solely to the extent that her response may disclose</p> <p>11 sensitive security information.</p> <p>12 Ms. Serrano, if you can answer the question or</p> <p>13 the parts of the question without disclosing sensitive</p> <p>14 security information, please feel free to do so.</p> <p>15 Otherwise, please hold the disclosure of sensitive</p> <p>16 security information. Thank you.</p> <p>17 MR. CORBETT: Before you answer,</p> <p>18 Ms. Smith, I thought that we had the issue of sensitive</p> <p>19 security information taken care of. Is that not the</p> <p>20 case?</p> <p>21 MS. SMITH: We discussed it. Yes. And I</p> <p>22 mentioned to you there was going to be some objections</p> <p>23 if your questions impede on SSI.</p> <p>24 And what Krista was objecting to is in the</p> <p>25 event that your question calls for it, Anita is not to</p>	<p>1 sensitive security information.</p> <p>2 MR. CORBETT: Look, we're going to have a</p> <p>3 problem here that's going to have to be resolved before</p> <p>4 the judge if she can't even answer how long her</p> <p>5 training was.</p> <p>6 MS. MAIZEL: I can't formulate questions</p> <p>7 for you. She's answered that she had classroom and</p> <p>8 on-the-job training.</p> <p>9 MR. CORBETT: The answer --</p> <p>10 MS. MAIZEL: Maybe there's a way to</p> <p>11 rephrase the question.</p> <p>12 BY MR. CORBETT:</p> <p>13 Q. The question, I will repeat one more time, how</p> <p>14 many days did your training last at the start of your</p> <p>15 employment?</p> <p>16 A. I believe the classroom training was</p> <p>17 approximately four weeks long.</p> <p>18 Q. Okay. And the rest of the training?</p> <p>19 A. The on-the-job training was between four and six</p> <p>20 weeks.</p> <p>21 Q. Okay. So a total of approximately two months of</p> <p>22 training; is that correct?</p> <p>23 A. Correct.</p> <p>24 Q. When you started with the TSA, what was the job</p> <p>25 that you started as?</p>
Page 7	Page 9
<p>1 answer. So proceed.</p> <p>2 MR. CORBETT: So just to clarify, you are</p> <p>3 instructing your witness not to speak of any SSI</p> <p>4 whatsoever during this call?</p> <p>5 MS. SMITH: Correct.</p> <p>6 MS. MAIZEL: That is correct.</p> <p>7 MR. CORBETT: You can -- for the record,</p> <p>8 please note my objection and note that the counsel for</p> <p>9 both parties did speak of this beforehand. And this</p> <p>10 comes as a surprise to me.</p> <p>11 BY MR. CORBETT:</p> <p>12 Q. Ms. Serrano, if you can answer the question</p> <p>13 without reviewing sensitive security information, I'll</p> <p>14 repeat. The question was: If you can describe the</p> <p>15 length and general subject matter of your training?</p> <p>16 A. The training included classroom training and</p> <p>17 on-the-job training.</p> <p>18 Q. Okay. How long was the training?</p> <p>19 A. I'm not sure that I can answer that.</p> <p>20 MR. CORBETT: Can we have a ruling from</p> <p>21 TSA's attorney as to whether she can answer how long</p> <p>22 her job training was?</p> <p>23 MS. MAIZEL: I don't know the extent of</p> <p>24 her understanding of the question, so I would reserve</p> <p>25 my objection to solely whether or not it discloses</p>	<p>1 A. A transportation security officer.</p> <p>2 Q. What is the general role of a transportation</p> <p>3 security officer?</p> <p>4 A. Perform screening functions at the assigned</p> <p>5 airport.</p> <p>6 Q. Passenger screening?</p> <p>7 A. Including passenger screening.</p> <p>8 Q. Okay. So would I understand correctly that your</p> <p>9 training included the subject matter of screening of</p> <p>10 passengers?</p> <p>11 A. It did include that.</p> <p>12 Q. Anything regarding pat-downs?</p> <p>13 A. I'm sorry. Can you repeat? You cut out for the</p> <p>14 first couple words.</p> <p>15 Q. Did your training include anything regarding</p> <p>16 pat-downs?</p> <p>17 A. Yes.</p> <p>18 Q. Specifically, you learned TSA's proper procedure</p> <p>19 for conducting pat-downs at the checkpoint; is that</p> <p>20 correct?</p> <p>21 A. That is correct.</p> <p>22 Q. Did you also learn how to deal with TSA body</p> <p>23 scanners, also known as advanced imaging technology?</p> <p>24 A. Yes. That was incorporated in the training.</p> <p>25 Q. Okay. Did the training include anything</p>

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<p style="text-align: right;">Page 10</p> <p>1 regarding when a private room is available or required to 2 be used by a passenger who is being screened? 3 MS. MAIZEL: Objection to the extent that 4 the response calls for sensitive security information. 5 If it does not, Ms. Serrano, you may answer. 6 THE WITNESS: It does. That's directly 7 talking about how the training referred to standard 8 operating procedures, which is SSI. 9 MR. CORBETT: TSA is now saying that they 10 cannot say whether the training discussed the use of a 11 private room; is that correct? 12 MS. MAIZEL: To the extent that that 13 response contemplates the disclosure of sensitive 14 security information, that is correct. 15 MR. CORBETT: I need TSA to explain if 16 that necessitates the release of sensitive security 17 information or not. 18 MS. MAIZEL: The full response from the 19 agency is that any question that calls for or 20 contemplates the disclosure of sensitive security 21 information will not be answered by this witness. 22 This witness is referring to her own -- she is 23 policing her answer in accordance with the restrictions 24 about disclosure of sensitive security information. 25 ///</p>	<p style="text-align: right;">Page 12</p> <p>1 designate SSI. 2 Q. Were you trained as to making a determination 3 that information constituted SSI, or, alternatively, were 4 you told that that was a task that was something other 5 people would be responsible for? 6 A. I was not trained as to whether or not I could 7 designate SSI or -- I'm -- if you can break that question 8 up, please. It's a -- I'm having trouble answering both 9 parts of the question. 10 Q. Sure. Based on your training, are TSA 11 transportation security officers tasked with determining 12 whether something constitutes SSI, or is that left to 13 other people? 14 A. Based -- I have not been trained on whether or 15 not TSA officers can designate SSI. That was not part of 16 my training. 17 Q. Okay. If you had a question as to something 18 that was -- as to whether or not something was SSI on the 19 job, how would you go about resolving that question? 20 Would you speak to someone? Would you do research? 21 A. We have and every checkpoint had an SSI officer 22 or typically in a managerial position, and you can ask 23 questions regarding standard operating procedures and 24 SSI. 25 Q. Okay. Have you ever had any legal training?</p>
<p style="text-align: right;">Page 11</p> <p>1 BY MR. CORBETT: 2 Q. Ms. Serrano, were you trained as to sensitive 3 security information? 4 A. Yes. 5 Q. During your training, was it made clear if you 6 were allowed to designate material as sensitive security 7 information or not? 8 MS. SMITH: I'm objecting. What was the 9 question? It sounds like you're asking for 10 attorney-client privileged information. 11 MR. CORBETT: Negative. The question 12 was: During -- 13 MS. SMITH: And I'm sorry. I just want 14 to say I can't really hear you either. If there's a 15 way you could like lean in. 16 Thank you. 17 BY MR. CORBETT: 18 Q. The question was: During your training, were 19 you trained as to whether or not you were allowed to 20 designate information as SSI? 21 A. I was trained as to what constitutes SSI. 22 Q. The question was: Were you trained as to 23 whether or not you personally may designate information 24 as SSI? 25 A. I was not trained on whether or not I could</p>	<p style="text-align: right;">Page 13</p> <p>1 A. No. 2 Q. Have you ever read the federal statute that 3 creates the SSI designation? 4 A. I have not. 5 Q. Have you ever read the federal regulations put 6 out by the TSA that detail what is and is not sensitive 7 security information? 8 A. Isn't the Code of Federal Regulations, the CFR 9 regarding SSI? I have not read that. 10 Q. Okay. Is it safe to say that you are not well 11 qualified to determine if something is or is not SSI? 12 MS. SMITH: I'll object to the form of 13 the question. 14 MR. CORBETT: Okay. Could we have the 15 witness answer? 16 THE WITNESS: Is it safe to say that? It 17 is safe to say -- I would feel safe saying that I am 18 not qualified to determine what is SSI. 19 MR. CORBETT: Great. Agency Counsel, 20 based on this admission from the witness that she can 21 and cannot determine whether something is sensitive 22 security information, I'm really not sure how you 23 expect this to proceed. 24 MS. MAIZEL: I didn't hear her. 25 MR. CORBETT: Before you speak, I want an</p>

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<p style="text-align: right;">Page 14</p> <p>1 objection on the record that this is obstruction. 2 Local counsel -- sorry, Counsel for TSA from 3 the Department of Justice spent last night filing a 4 motion accusing me of violating the local Rule 11 5 requiring professionalism and civility. And yet here we 6 are during the deposition that my client must pay for, 7 and eventually you will pay for, where I'm not allowed 8 to question a witness regarding SSI despite the fact 9 that we took care of this issue in advance. I want that 10 on the record. 11 The question was to TSA's in-house counsel, how 12 is this deposition going to proceed when the witness 13 cannot determine what is SSI and therefore cannot 14 determine when she can make an answer? 15 MS. MAIZEL: If I may, I don't recall 16 that being the first question. The first question that 17 I recall was whether or not she is able to determine or 18 was she trained in determining SSI. 19 She -- I believe the testimony from the witness 20 is that she was not trained in how to designate SSI, but 21 she was trained in what was distinguished or determined 22 to be SSI, which I understand to be two different 23 issues. 24 How the deposition proceeds maybe is something 25 we need to talk about without the witness in the room,</p>	<p style="text-align: right;">Page 16</p> <p>1 complied with the procedure that I informed you about. 2 MR. CORBETT: I will look forward to 3 motion practice. 4 I'm going to continue with the deposition 5 anyway, even though I am pessimistic that I will be able 6 to get the answers that I'm required -- that the witness 7 is required to provide by law. 8 MS. SMITH: Well, I think -- what I think 9 we should do, then, is I think we should call the 10 magistrate. I'll pull up the number here. Because 11 what I don't want is I don't think you will be entitled 12 to depose my client twice. It's inappropriate. 13 Especially since you knew about the procedure up front. 14 And to avoid that, I'm totally comfortable to 15 present it to the magistrate, and we can discuss that 16 accordingly. 17 MR. CORBETT: Sure. If you would like to 18 get a magistrate on the line, that's fine. 19 MS. SMITH: Okay. So we will take a 20 break. We will go off the record. 21 What I'll do is I'll pull the number, and I'll 22 circulate a call-in number. 23 MR. CORBETT: Okay. 24 MS. SMITH: All right. Thanks. 25 (Brief Recess.)</p>
<p style="text-align: right;">Page 15</p> <p>1 or I defer to Ms. Smith who I know had most recent 2 conversations with you. I was not privy to those 3 conversations. 4 MS. SMITH: Correct. Jonathan and I 5 discussed SSI, the issue of it. I asked him if he 6 understood it, he said that he did. 7 I asked him if he complied with the procedure 8 for TSA to ask about SSI. He said -- well, actually, I 9 don't think you answered whether you had or you hadn't. 10 So he's aware of it, and he chose to proceed today 11 accordingly. 12 MR. CORBETT: Ms. Smith, I very clearly 13 asked you what procedures you would like me to follow, 14 and you said you would check with your client. 15 Your e-mail says, quote, Forgive me as we have 16 not had many TSA cases in our office with -- so the 17 intricacies I need to confer with TSA. 18 I received no further follow-up e-mail on that 19 from you. 20 MS. SMITH: I told you -- you asked some 21 inappropriate question in an e-mail, and I said the way 22 you framed that e-mail, I mean, if you actually ask it, 23 sounds like it would avoid the SSI. 24 So if you had any other further questions, you 25 could have called, and you certainly should have</p>	<p style="text-align: right;">Page 17</p> <p>1 (Parties Appearing Telephonically) 2 JUDGE FERENBACH: This is 3 Judge Ferenbach. 4 Okay. Who is on the line, please? 5 MS. SMITH: Brianna Smith for the Federal 6 Defendants. 7 JUDGE FERENBACH: Ms. Smith. 8 MR. CORBETT: Thank you. Jonathan 9 Corbett for the plaintiff, Your Honor. 10 JUDGE FERENBACH: Thank you, Mr. Corbett. 11 Anybody else on the line? 12 MS. MAIZEL: Yes, Your Honor. My name is 13 Krista Maizel. I'm an attorney with the Transportation 14 Security Administration. 15 JUDGE FERENBACH: All right. So you're 16 not of record in this case, are you, Ms. Maizel? 17 MS. MAIZEL: No, Your Honor. 18 JUDGE FERENBACH: So you're the client 19 representative, I guess? 20 MS. MAIZEL: Yes. 21 JUDGE FERENBACH: Okay. All right. 22 All right. So I understand there's a problem 23 during the deposition of Ms. Anita Serrano. So who 24 wants to tell me about that? 25 MS. SMITH: I'll start, Your Honor.</p>

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<p style="text-align: right;">Page 18</p> <p>1 This is a case involving what is alleged to be, 2 like, an improper pat-down for the short version. 3 Under the CFR -- in order to ask about 4 sensitive security information, the requesting attorney 5 in this case, Mr. Corbett, has to comply with the 6 background check. And Krista can speak to that a little 7 better than me. 8 And before the deposition began, we had a 9 discussion about that. Mr. Corbett said that he was 10 aware of the procedure. And, you know, he said, Would 11 this type of question be okay? And he said, for 12 example, During your training, did you understand -- 13 JUDGE FERENBACH: You know what, 14 Ms. Smith, Ms. Smith, you're getting a little too deep 15 in the weeds for me. 16 What I understand is the questions have been 17 asked, and you're asserting a privilege? 18 MS. SMITH: Correct. 19 JUDGE FERENBACH: Okay. 20 MS. SMITH: And it's based on sensitive 21 security information. Right. 22 JUDGE FERENBACH: All right. And so 23 based on the privilege that you're asserting, you're 24 instructing the witness not to answer? 25 MS. SMITH: Yes.</p>	<p style="text-align: right;">Page 20</p> <p>1 the deponent and has not appeared, but is here any way, 2 instructed the witness not to reveal any SSI, which 3 caused the witness to be unable to respond. And in 4 part because the witness is not trained as to 5 determining whether things are SSI or not. 6 So, essentially, the other side has given the 7 witness an out to any question she wants. 8 JUDGE FERENBACH: I understand your 9 problem, sir. 10 Here's what we're going to do. Rule 30, 30(c), 11 it governs examination during deposition. And it says, 12 A person may instruct a deponent not to answer only when 13 necessary to preserve a privilege, and some other 14 reasons. But this is the one that applies here. 15 The U.S. Government is taking the position that 16 the questions you're asking are covered by a privilege. 17 I have a hearing at 10 o'clock. I've got a lot 18 of other things to do here. I'm not going to be able to 19 sort through these questions today on the phone. 20 So here's what we're going to do. You can ask 21 sort of a range of questions, if you want. Don't take 22 too long about it. So you created a record of what 23 questions you think are, you know, improperly being 24 instructed not to answer. And then you will need to 25 file a motion to compel. And then I'll give the</p>
<p style="text-align: right;">Page 19</p> <p>1 JUDGE FERENBACH: All right. 2 Mr. Corbett? 3 MR. CORBETT: Hi, Your Honor. The issue 4 is that the TSA in this deposition is essentially 5 asserting that pretty much anything that happens in the 6 checkpoint and with the training of its employees 7 constitutes sensitive security information. 8 The question that triggered this call asked 9 this TSA screener, who was the deponent, if she was 10 trained as to whether or not to take passengers into a 11 private room during the screening. 12 TSA counsel -- 13 JUDGE FERENBACH: Sorry. Hold on. Hold 14 on. Was that the question? That was the end of the 15 question? 16 MR. CORBETT: That was the question. 17 Correct. 18 JUDGE FERENBACH: All right. Okay. So 19 then -- and then -- hold on. Hold on. You know, we're 20 doing this on the phone, so you've got to take a 21 breath. All right? 22 And after you asked that question, Ms. Smith 23 instructed the witness not to answer? 24 MR. CORBETT: No. Ms. Maizel, the 25 counsel for TSA, who I do not believe is counsel for</p>	<p style="text-align: right;">Page 21</p> <p>1 government a chance to respond on it. You can reply. 2 If I need a hearing, I will set one, and we will sort it 3 out. 4 But at this stage, during the deposition, 5 although I -- I don't think Ms. Maizel should be 6 involved instructing the witness in any way. She's the 7 client representative sitting there. It's going to have 8 to be Ms. Smith as the attorney of record. And, you 9 know, within her scope of her obligations as an officer 10 of the court that's instructing on a good faith basis on 11 privilege. Because that's all going to get sorted out. 12 Any questions? 13 MR. CORBETT: No, Your Honor. That 14 sounds perfectly comprehensible to me. 15 MS. SMITH: Yes. That's sounds fine. 16 Thank you. 17 JUDGE FERENBACH: Now, let's talk about a 18 couple other things as long as I've got you here. 19 I've got the docket up, and there's this 20 emergency motion to strike a memorandum. Let's see. I 21 wrote that down. Hold on. I'll be right back. 22 Looks like it's a December 28th, 2020 23 memorandum from Ms. Smith to the US Attorney for 24 District of Nevada, Mr. Trutanich, entitled Request for 25 Certification of Scope of Employment. And, you know,</p>

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1 the -- basically it's a clawback type issue.
 2 What I have done is I have contacted the
 3 clerk's office, and I have ordered that Docket 34-1 be
 4 sealed. And I see now it already has, the miracles of
 5 electronics. And, of course, 32 is already sealed
 6 because when the 34 took the place of 32, 32 got sealed.
 7 So for now, temporarily, that's sealed.

8 You know, I've got the motion and the response.
 9 If the government wants to file a reply, you know, get
 10 it in to me by next Wednesday. I'll take a look at it,
 11 maybe I can rule on the papers.

12 If not, I'll set a hearing. And, also, I just
 13 learned that Judge Mahan has referred to me the actual
 14 motion -- oh, yeah. The motion to substitute parties,
 15 which is now, I guess -- which number is that?

16 Let's see. The original motion to substitute
 17 parties was 32. So I guess that's 34. But it doesn't
 18 have a flag on it. I don't know why.

19 Anyway, I'm going to be deciding that motion to
 20 substitute parties. So if there needs to be any -- does
 21 there need to be any more briefing on that?

22 MR. CORBETT: Your Honor, there's a bit
 23 of an issue because although the UCF system sees it as
 24 a motion, the documents were captioned as a notice.
 25 The TSA is attempting to substitute parties as of

Page 24

1 write it up a little better, that's fine. So I think
 2 the ordinary time it would be due would be maybe the
 3 12th, next Tuesday.

4 Can you just get it in by the 12th?

5 MR. CORBETT: Yes, Your Honor.

6 JUDGE FERENBACH: Okay. Great. So that
 7 will be the 12th. Reply in the ordinary course.

8 If I can decide the emergency motion to strike
 9 without a hearing, I'll get that out of the way. But we
 10 will probably hold a hearing on the substitute, maybe, I
 11 don't know. I've got to look at it. And if there's
 12 going to be a motion to compel based on the instructions
 13 not to answer, why don't you get that in to me by next
 14 Wednesday, too, Mr. Corbett, so I can know, you know --
 15 manage it so we can do everything as efficiently as
 16 possible.

17 MR. CORBETT: Yes, Your Honor.

18 JUDGE FERENBACH: Okay. Well, have a
 19 good Friday, everyone. Thank you.

20 MS. SMITH: Thank you. Have a good one.

21 MS. MAIZEL: Thank you.

22 (Brief Recess.)

23 (Proceedings Resumed on Zoom Videoconference.)

24 BY MR. CORBETT:

25 Q. Ms. Serrano, just before we begin, I'd like to

Page 23

1 right. So you will see my --

2 JUDGE FERENBACH: You know, what
 3 Mr. Corbett. You're going to do a lot better with me
 4 if you just answer my question than try and make some
 5 argument that's on the top of your mind.

6 MR. CORBETT: I apologize, Your Honor.

7 JUDGE FERENBACH: Does there need to be
 8 any more briefing on the motion to substitute?

9 MR. CORBETT: I think that there may be a
 10 lot more briefing and potentially an evidentiary
 11 hearing on, well, the notice of substitution.

12 JUDGE FERENBACH: All right. Well, it
 13 says to me Number 32, motion to substitute party, is
 14 referred to me, which I guess is now 34.

15 So 32 is viewed as a motion. It was filed on
 16 December 30th. And there's been no response to it yet,
 17 other than the motion to strike.

18 So let me ask it this way: Mr. Corbett, do you
 19 want to file an opposition to Number 32, which is now
 20 Number 34, the motion to substitute parties?

21 MR. CORBETT: Yes, Your Honor. If the
 22 Court is viewing Number 34 as a motion, I would like to
 23 oppose it. I think I put most of the argument that I
 24 would write in that motion to strike.

25 JUDGE FERENBACH: Okay. If you want to

Page 25

1 remind you that you're still under the oath from before.

2 Is there a private room at the checkpoint
 3 where passengers are sometimes taken for screening?

4 A. Yes.

5 Q. Were you trained as to the purpose of this room?

6 A. The purpose? The -- yes.

7 Q. Okay. And what is the purpose of that private
 8 room?

9 A. To conduct private screening.

10 Q. Is there a rule that requires certain varieties
 11 of screening to be conducted in the private room?

12 A. There is --

13 MS. SMITH: Objection to form.

14 THE WITNESS: -- SSI.

15 BY MR. CORBETT:

16 Q. I'm sorry? Your answer one more time?

17 A. There are specific rules regarding private
 18 screening rooms.

19 Q. Okay. And did your training cover that?

20 A. That's -- the content of the training is SSI.

21 Q. Okay. So if there is a privilege, it needs to
 22 be called out by your attorney.

23 Ms. Smith, is there an objection here?

24 MS. SMITH: I think what you asked was:

25 Are there rules that cover that room? And her answer

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<p>1 is yes. So --</p> <p>2 MR. CORBETT: Right. The next question</p> <p>3 was: Did your training cover those rules, to which the</p> <p>4 witness so far has refused to answer. Do you have an</p> <p>5 objection?</p> <p>6 MS. SMITH: I don't think so. I don't</p> <p>7 think she said that.</p> <p>8 MR. CORBETT: Okay. Let me ask one more</p> <p>9 time.</p> <p>10 BY MR. CORBETT:</p> <p>11 Q. Did your training cover the rules for the</p> <p>12 private room?</p> <p>13 A. Yes.</p> <p>14 Q. Okay.</p> <p>15 MS. SMITH: I'm sorry. You're breaking</p> <p>16 up. So that doesn't help either.</p> <p>17 MR. CORBETT: I didn't say anything yet.</p> <p>18 BY MR. CORBETT:</p> <p>19 Q. Did your job title change at all during your</p> <p>20 tenure with the TSA?</p> <p>21 A. It did.</p> <p>22 Q. What other job titles did you have?</p> <p>23 A. Lead transportation security officer.</p> <p>24 Q. Approximately when did you receive that</p> <p>25 promotion?</p>	<p>1 Q. And before working for TSA, did you have another</p> <p>2 job?</p> <p>3 A. Yes.</p> <p>4 Q. What was the job you held immediately prior to</p> <p>5 working for TSA?</p> <p>6 A. I worked at the Ethel M Chocolate Factory in</p> <p>7 Las Vegas.</p> <p>8 Q. Okay. Have you ever been arrested?</p> <p>9 A. No.</p> <p>10 Q. Have you been to college?</p> <p>11 A. Yes.</p> <p>12 Q. Did you finish college?</p> <p>13 A. Yes. I have a bachelor's degree.</p> <p>14 Q. And what's your bachelor's in?</p> <p>15 A. It's in professional aeronautics with dual</p> <p>16 minors in occupational safety and health and aviation</p> <p>17 safety.</p> <p>18 Q. Are you married?</p> <p>19 A. I am not.</p> <p>20 Q. Do you live with a partner?</p> <p>21 A. No. I do not.</p> <p>22 Q. Did you do anything to prepare for this</p> <p>23 deposition?</p> <p>24 A. I read the statements of the -- of STSO Brionnes</p> <p>25 and TSO Jacobs. And I read my original redacted</p>
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<p>1 A. I would say August. It was about a year and a</p> <p>2 half after I had started. So August 2018.</p> <p>3 Q. Was that your title on June 30th, 2019?</p> <p>4 A. It was.</p> <p>5 Q. Do you still work for the TSA?</p> <p>6 A. I do not.</p> <p>7 Q. When did your employment with TSA end?</p> <p>8 A. It was December -- December 2019.</p> <p>9 Q. Did your employment end because you resigned, or</p> <p>10 were you terminated or otherwise? What happened?</p> <p>11 A. I resigned.</p> <p>12 Q. What was the reason for resigning your job?</p> <p>13 A. I was feeling burned out.</p> <p>14 Q. Have you taken a new job since?</p> <p>15 A. I have.</p> <p>16 Q. What do you do?</p> <p>17 A. I am an environmental health and safety</p> <p>18 technician. I am a contractor for a large aerospace</p> <p>19 company.</p> <p>20 Q. And where are you located now?</p> <p>21 A. Where is -- my residence or my employment?</p> <p>22 Q. Where do you live?</p> <p>23 A. I live in Washington --</p> <p>24 Q. Okay.</p> <p>25 A. -- State.</p>	<p>1 statement that I wrote in this -- about approximately,</p> <p>2 what was that, July 2019.</p> <p>3 Q. The first name you mentioned, it was</p> <p>4 STSO Brionnes, if I heard that right. Can you spell that</p> <p>5 name?</p> <p>6 A. I believe it's B-r-i-o-n-n-e-s.</p> <p>7 Q. Do you know STSO Brionnes' first name?</p> <p>8 A. Nilda, N-i-l-d-a.</p> <p>9 Q. Was she your direct supervisor on June 30th,</p> <p>10 2019?</p> <p>11 A. She was not my direct supervisor, as in I was</p> <p>12 not assigned to her. But she was on the checkpoint.</p> <p>13 Q. Okay. And what was her role in interacting with</p> <p>14 my client? And I'll specify that any time I use the word</p> <p>15 "my client" during the deposition, I'm speaking of</p> <p>16 Michele Leuthauser?</p> <p>17 A. STSO Brionnes completed the pat-down.</p> <p>18 Q. Thank you.</p> <p>19 The second name that you mentioned was Jacobs;</p> <p>20 is that correct? Common spelling?</p> <p>21 A. That's correct.</p> <p>22 Q. Do you know TSO Jacobs' first name?</p> <p>23 A. It's Michellin.</p> <p>24 Q. M-i-c-h-e-l-l-i-n?</p> <p>25 A. That's as close as I would be able to get.</p>

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<p>1 Q. Thank you.</p> <p>2 And Ms. Jacobs is the female?</p> <p>3 A. Yes.</p> <p>4 Q. What was her role?</p> <p>5 A. She was TSO, and she was the second female in</p> <p>6 the private screening room. Second officer, I mean.</p> <p>7 Second female officer.</p> <p>8 Q. Thank you. Have you spoken to anyone other than</p> <p>9 your attorney about this case?</p> <p>10 A. No.</p> <p>11 Q. At no point you spoke to other TSA employees?</p> <p>12 A. Certainly not.</p> <p>13 Q. You did not speak to any investigators?</p> <p>14 A. I spoke to somebody with the Office of the</p> <p>15 Inspector General interviewed me in July 2019.</p> <p>16 Q. During that discussion, what was the nature of</p> <p>17 it?</p> <p>18 A. She took a verbal testimony from me.</p> <p>19 Q. Have you reviewed any documents pertaining to</p> <p>20 this case other than the three that I think you</p> <p>21 mentioned, which were the statements of STSO Brionnes,</p> <p>22 TSO Jacobs, and your own redacted statement?</p> <p>23 A. Other than the court documents that my lawyers</p> <p>24 have sent me, no.</p> <p>25 Q. Which court documents have you reviewed?</p>	<p>1 A. McCarran International Airport at the C annex</p> <p>2 checkpoint.</p> <p>3 Q. I'm pretty familiar with McCarran Airport. I'm</p> <p>4 not familiar with what an annex is. Is that just a</p> <p>5 secondary checkpoint off of C?</p> <p>6 A. It's the checkpoint where most Southwest flights</p> <p>7 fly out of. It's just -- that's what they call the</p> <p>8 checkpoint because you have to access it from a long</p> <p>9 hallway, so they call it the annex.</p> <p>10 Q. Oh, so it's a hallway that leads you just past</p> <p>11 the regular checkpoint C? Is that the idea?</p> <p>12 A. No. There is only one checkpoint C. They just</p> <p>13 call it C annex. I don't know why. It's -- there is one</p> <p>14 way to access it, is down a long hallway.</p> <p>15 Q. Okay. The only way to access the C gates is</p> <p>16 through the C annex?</p> <p>17 A. That's not correct.</p> <p>18 On the other side of the checkpoint, all of</p> <p>19 the gates are connected so that you can go through any</p> <p>20 checkpoint and still get your -- catch your flight at</p> <p>21 any gate.</p> <p>22 So once you're through any other checkpoint,</p> <p>23 you could still access the -- the C checkpoint from any</p> <p>24 other location.</p> <p>25 Q. What were your job duties on the date of</p>
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<p>1 A. I don't have them offhand. It was the original</p> <p>2 when Ms. Maizel first contacted me and sent me a -- I'm</p> <p>3 not sure what that was.</p> <p>4 Q. Did you read a document that might have been</p> <p>5 entitled Complaint?</p> <p>6 A. I may have.</p> <p>7 Q. Just so that we understand, we're hopefully</p> <p>8 talking about the same thing, a Complaint is a document</p> <p>9 that starts a court case that sets out the allegations by</p> <p>10 plaintiff against defendant.</p> <p>11 Does that sound like a document you might have</p> <p>12 reviewed?</p> <p>13 A. It does.</p> <p>14 Q. Great. Were you working for TSA on June 30th,</p> <p>15 2019? And I apologize. Some of these questions may seem</p> <p>16 repetitive, but I've got to get them out there.</p> <p>17 A. I was.</p> <p>18 Q. Did you follow your training at all times on</p> <p>19 that day?</p> <p>20 A. I did.</p> <p>21 Q. So, to the best of your recollection, you did</p> <p>22 not break any of TSA's rules or policies that day.</p> <p>23 Correct?</p> <p>24 A. That's correct.</p> <p>25 Q. Where was your job location on June 30th, 2019?</p>	<p>1 June 30th, 2019?</p> <p>2 A. Passenger screening. Property screening.</p> <p>3 Q. Okay. So you worked at the checkpoint, and you</p> <p>4 would, perhaps, use technology to search bags, as well as</p> <p>5 operate body scanners and conduct pat-downs. Does that</p> <p>6 sound about right?</p> <p>7 A. Yes. We would use equipment to conduct</p> <p>8 screening operations.</p> <p>9 Q. Do you remember interacting with my client?</p> <p>10 A. I do.</p> <p>11 Q. Can you describe my client's appearance, just as</p> <p>12 I asked you before, approximate weight, maybe height,</p> <p>13 skin tone?</p> <p>14 A. Fair skin tone. Taller than I. So I would say</p> <p>15 not -- not short. I would call myself short. So taller</p> <p>16 than myself. Maybe above average weight. That's it.</p> <p>17 Q. How tall are you, Anita?</p> <p>18 A. I'm 5-foot-3.</p> <p>19 Q. Thank you.</p> <p>20 When did you first see my client?</p> <p>21 A. I approached her standing out -- standing in</p> <p>22 front of the AIT ATR, or I guess it would be in back. In</p> <p>23 back of it. Behind it.</p> <p>24 Q. Were you working the AIT machine at that time?</p> <p>25 A. I was not.</p>

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10 (Pages 34 to 37)

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<p>1 Q. How did you end up at the AIT machine?</p> <p>2 A. I was -- somebody came over the radio and asked</p> <p>3 if there was a female available for a private screening</p> <p>4 to which I replied that I was and asked which lane the</p> <p>5 passenger was waiting at.</p> <p>6 Q. Did you see the results of the body scanner</p> <p>7 screening?</p> <p>8 A. I did not.</p> <p>9 Q. Were you told what the results were?</p> <p>10 A. Yes, I was.</p> <p>11 Q. What were you told?</p> <p>12 A. I was told that there was a groin anomaly.</p> <p>13 Q. Groin anomaly.</p> <p>14 So we're clear for the record, does a groin</p> <p>15 anomaly mean that the AIT machine detected that</p> <p>16 something was on the person of my client's -- in the</p> <p>17 area of her groin?</p> <p>18 A. That means that the image produced by the scan</p> <p>19 indicates an alarm or an anomaly across a certain area.</p> <p>20 Q. Okay. So if it were something -- if something</p> <p>21 were concealed on my client's upper thigh, would that</p> <p>22 come as a groin alarm?</p> <p>23 A. Can't say. In a situation where we're talking</p> <p>24 about technology that produces a two-dimensional image,</p> <p>25 so I can't say if someone had something concealed on</p>	<p>1 respect to your answer? I just want to make sure I</p> <p>2 heard it right.</p> <p>3 THE WITNESS: Yes. It's -- as I</p> <p>4 understand, the question is asking me if an alarm or</p> <p>5 anomaly is produced in a certain area, does that</p> <p>6 constitute a groin alarm?</p> <p>7 And that is directly from the standard</p> <p>8 operating procedure, which has been designated SSI.</p> <p>9 MS. SMITH: Okay. I'll object and</p> <p>10 instruct her not to answer on SSI grounds.</p> <p>11 BY MR. CORBETT:</p> <p>12 Q. When you approached my client, what did you</p> <p>13 first say to her?</p> <p>14 A. I said, Hi, are you the one who has asked for a</p> <p>15 private screening?</p> <p>16 Q. Over the radio, were you told that my client</p> <p>17 asked for a private screening?</p> <p>18 A. No.</p> <p>19 Q. So why did you come up to my client and ask her</p> <p>20 if she's the one who asked for a private screening?</p> <p>21 MS. SMITH: I'll object. Lacks</p> <p>22 foundation.</p> <p>23 Go ahead.</p> <p>24 MR. CORBETT: Ms. Serrano.</p> <p>25 THE WITNESS: When -- can you repeat the</p>
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<p>1 their upper thigh whether or not it would produce an</p> <p>2 anomaly on or not. That's the -- up to the technology,</p> <p>3 not myself.</p> <p>4 Q. Certainly. And I understood that the AIT is not</p> <p>5 particularly effective. But my question is: Is there a</p> <p>6 separate alarm? Let's say the AIT machine did detect</p> <p>7 something on an upper thigh. Would that still be a groin</p> <p>8 alarm, or would that be some kind of separate alarm?</p> <p>9 A. I -- the answer is SSI.</p> <p>10 MS. SMITH: I'll object to SSI.</p> <p>11 MR. CORBETT: Sorry. Just to be clear, I</p> <p>12 could barely hear you, Ms. Smith. Counsel is objecting</p> <p>13 that SSI is here?</p> <p>14 MS. SMITH: Yes. I'll object to SSI and</p> <p>15 instruct her not to answer.</p> <p>16 BY MR. CORBETT:</p> <p>17 Q. If my client were -- scratch that.</p> <p>18 If the AIT were to detect something around my</p> <p>19 client's lower abdomen, would that alarm be a groin</p> <p>20 alarm?</p> <p>21 A. The answer is SSI.</p> <p>22 MR. CORBETT: Okay. So, Ms. Smith, I'm</p> <p>23 going to need you to assert privilege, not the witness.</p> <p>24 MS. SMITH: I think that question was</p> <p>25 similar to the other question, wasn't it, Anita, with</p>	<p>1 question, please?</p> <p>2 BY MR. CORBETT:</p> <p>3 Q. You testified that you started the interaction</p> <p>4 with my client by asking her if she was the passenger who</p> <p>5 requested a private screening.</p> <p>6 Why did you say that to her?</p> <p>7 A. When a person receives advisements, and this is</p> <p>8 information that's given to the public.</p> <p>9 When a person receives advisements that they</p> <p>10 have -- they have an anomaly or an alarm in a certain</p> <p>11 area of their body, part of the advisements is to ask,</p> <p>12 Are you -- Would you like to request a private</p> <p>13 screening? If the passenger answers in the</p> <p>14 affirmative, then another officer is asked to complete</p> <p>15 the private screening pat-down.</p> <p>16 So when I was asked over the radio, Is there a</p> <p>17 person available for a private screening, and I was</p> <p>18 told that they were waiting outside of an AIT ATR, then</p> <p>19 it was reasonable for me to deduce that it was because</p> <p>20 that's part of the standard advisements is Would you</p> <p>21 like a private screening?</p> <p>22 Q. Ms. Serrano, I think I'm hearing competing</p> <p>23 testimony from you. I think that I heard you say</p> <p>24 originally that you were told that a passenger needed</p> <p>25 assistance and that you were not told that she requested</p>

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<p style="text-align: right;">Page 38</p> <p>1 a private room. Yet your answer to the most recent 2 question seems to indicate that you were advised that she 3 asked for a private room.</p> <p>4 Can you clarify whether over the radio, you 5 were told that this passenger requested a private 6 screening?</p> <p>7 MS. SMITH: I'll object. Form. 8 Compound.</p> <p>9 THE WITNESS: I was asked over the radio, 10 Is there a female available for a private screening? I 11 replied, Yes.</p> <p>12 When I approached, I deduced on my own that it 13 was because she had gone through the machine, the 14 scanner, received her advisements, and -- see, if I go 15 into the difference between a required private screening 16 and a requested private screening, then that's SSI. 17 That's directly from SOP.</p> <p>18 So no. Nobody -- to answer your question, 19 nobody told me that the passenger requested a private 20 screening.</p> <p>21 BY MR. CORBETT:</p> <p>22 Q. Thank you.</p> <p>23 Did you advise my client that she was not 24 required to go to a private room?</p> <p>25 A. I did not.</p>	<p style="text-align: right;">Page 40</p> <p>1 A. Yes. Knowledge of the SOP told me that this was 2 a targeted pat-down, not a resolution pat-down.</p> <p>3 Q. And would that be based on the results that the 4 body scanner put out?</p> <p>5 A. It is based on the procedures that are laid out 6 for TSA officers to follow.</p> <p>7 Q. I'm not sure that's responsive to my question, 8 so I will repeat it.</p> <p>9 Is the output of the body scanner the thing 10 that causes a targeted pat-down to be required versus a 11 simple resolution pat-down?</p> <p>12 MS. SMITH: I'll object. I think that 13 calls for SSI as well. And I'll instruct her not to 14 answer.</p> <p>15 BY MR. CORBETT:</p> <p>16 Q. Ms. Serrano, you testified before that you did 17 not see the results of the body scanner. By the way, 18 just for clarity, any time I say "body scanner," I'm 19 referring to AIT.</p> <p>20 You testified that you did not see the results 21 of my client's body scan; is that correct?</p> <p>22 A. That is correct.</p> <p>23 Q. Other than telling you that there was a groin 24 anomaly, were you advised as to the result of my client's 25 body scan?</p>
<p style="text-align: right;">Page 39</p> <p>1 Q. Was my client required to go to a private room?</p> <p>2 A. No.</p> <p>3 Q. Is it fair to say that you intended to conduct a 4 resolution pat-down on my client?</p> <p>5 A. No. That is not fair.</p> <p>6 Q. What is the difference between a resolution 7 pat-down and the pat-down you intended to perform on my 8 client?</p> <p>9 A. The pat-down I intended to perform is called a 10 targeted pat-down. And I cannot disclose the difference 11 between the two, because that is directly from the SOP.</p> <p>12 Q. Okay. So my understanding -- and I haven't been 13 exposed to the SOP that speaks of this, this is just from 14 my experience flying -- is that a resolution pat-down 15 happens at the checkpoint when there is an anomaly, 16 versus this targeted pat-down you speak of when an 17 anomaly cannot be resolved at the checkpoint.</p> <p>18 Do I have that right?</p> <p>19 MS. SMITH: I'll object that it calls for 20 SSI and instruct the witness not to answer.</p> <p>21 BY MR. CORBETT:</p> <p>22 Q. What was it -- scratch that.</p> <p>23 Was there something in particular that caused 24 you to decide that this would be a targeted pat-down, 25 not a resolution pat-down?</p>	<p style="text-align: right;">Page 41</p> <p>1 A. No. I was told that it was a groin anomaly.</p> <p>2 Q. Did you follow your training and TSA procedures 3 when you decided a targeted pat-down was required with no 4 more information than that there was a groin anomaly?</p> <p>5 A. Yes.</p> <p>6 Q. Did you suspect that my client had something on 7 her person that she was secreting that you would find 8 during a pat-down?</p> <p>9 MS. SMITH: I'll object to the form of 10 the question.</p> <p>11 MR. CORBETT: Ms. Serrano.</p> <p>12 THE WITNESS: The results of an anomaly 13 raised suspicion. That's correct. So yes. If I 14 received results from the technology indicating an 15 anomaly is present, then I am alarmed by any alarm.</p> <p>16 BY MR. CORBETT:</p> <p>17 Q. Is it fair to say that frequently AIT results in 18 false alarms, in your experience?</p> <p>19 A. I don't know that I can -- I'm not an expert on 20 the -- the rate of anomalies which are resolved without 21 incident versus the anomalies which produce a prohibited 22 item.</p> <p>23 Q. Thank you.</p> <p>24 Ms. Serrano, would you say that you have done 25 more than 100 of these targeted pat-downs as a result</p>

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<p>1 of the groin alarm in your experience for TSA?</p> <p>2 A. Yes.</p> <p>3 Q. Would you say that more than half of the time</p> <p>4 you conducted a pat-down, you found -- for that reason,</p> <p>5 you found nothing?</p> <p>6 A. Finding nothing, I don't know what constitutes</p> <p>7 finding nothing.</p> <p>8 Q. Finding no objects concealed on the person?</p> <p>9 A. No prohibited items concealed on the person?</p> <p>10 Q. Well, let's start with prohibited items. Yes.</p> <p>11 A. I would say that in -- can you repeat the</p> <p>12 question, please?</p> <p>13 Q. Absolutely.</p> <p>14 Would you say that the majority of times you</p> <p>15 conducted targeted pat-down as a result of an AIT groin</p> <p>16 alarm, you do not find a prohibited item?</p> <p>17 A. Yes. I would say that.</p> <p>18 Q. Would you say that the majority of the times</p> <p>19 that you conduct a targeted pat-down as a result of an</p> <p>20 AIT groin alarm, you did not find any item concealed on</p> <p>21 the person?</p> <p>22 A. I would not say that. I would say that the</p> <p>23 majority of the time an item is found in the area at</p> <p>24 which the body scanner produces an anomaly.</p> <p>25 Q. Would you say that at least 25 percent of the</p>	<p>1 Q. She refused or what happened?</p> <p>2 A. She did not reply to my request or acknowledge</p> <p>3 my request. She walked over to where her property</p> <p>4 ultimately was coming off of the -- you know, off of the</p> <p>5 chute, the rollers, and she picked up her cell phone.</p> <p>6 Q. Did you take this as her ignoring your command</p> <p>7 or just simply failing to understand?</p> <p>8 A. I -- I was speaking clearly and was close enough</p> <p>9 that she could hear me. And I was using plain language.</p> <p>10 So I suppose I took it as that she was ignoring, not that</p> <p>11 she -- there was a failure to understand.</p> <p>12 Q. Okay. So did you take this as her failing to</p> <p>13 respect your authority to give those commands?</p> <p>14 A. I just took it as a -- I don't know that I</p> <p>15 thought that much into it, that I have an authority that</p> <p>16 I'm trying to assert and she's openly defiant. I didn't</p> <p>17 think about it in those terms, really.</p> <p>18 Q. Okay. After my client grabbed or touched her</p> <p>19 cell phone, what happened next?</p> <p>20 A. I said, Don't touch it. Just tell me what's</p> <p>21 yours, and I'll pick it up.</p> <p>22 Q. And --</p> <p>23 A. And she threw her cell phone down in the bin and</p> <p>24 gestured to a second bin, that that was hers as well.</p> <p>25 Q. Okay. And what happened next?</p>
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<p>1 time you conduct a targeted pat-down as a result of a</p> <p>2 groin search, you do not find any item at all?</p> <p>3 A. No. I would not say that.</p> <p>4 Q. Okay. So to be clear, you're saying more than</p> <p>5 75 percent of the time you conduct such a pat-down -- a</p> <p>6 targeted pat-down as a result of a groin anomaly, you do</p> <p>7 actually find an object?</p> <p>8 A. An object. Yes.</p> <p>9 Q. To be clear about your testimony from there, are</p> <p>10 you saying that there are some times that a client can</p> <p>11 request a private room and other times where the TSA</p> <p>12 directs a client that they must go to a private room?</p> <p>13 A. That's correct.</p> <p>14 Q. After you asked my client if she was the</p> <p>15 passenger who requested a private room, what did she tell</p> <p>16 you?</p> <p>17 A. She affirmed. I don't know if she said yes or</p> <p>18 yeah, but she affirmed.</p> <p>19 Q. And what did you tell her then?</p> <p>20 A. I asked her to step to where her property was</p> <p>21 exiting the X-ray machine. And I asked for her to point</p> <p>22 out her property to me without touching it so that I</p> <p>23 could pick it up.</p> <p>24 Q. Did she do that?</p> <p>25 A. She did not.</p>	<p>1 A. So I picked up the -- both of the bins. And I</p> <p>2 asked her to follow me to the private screening room,</p> <p>3 which is located in the back of the checkpoint.</p> <p>4 Q. Did my client comply?</p> <p>5 A. She followed me.</p> <p>6 Q. Okay. So the two of you traveled to a private</p> <p>7 screening room. I'm assuming this is quite near the</p> <p>8 checkpoint?</p> <p>9 A. It is. It's at the very back of the checkpoint.</p> <p>10 At the end of the lanes with some space for walking. An</p> <p>11 aisleway in between.</p> <p>12 Q. Was there a closed door that you opened for her?</p> <p>13 A. I don't recall if the door was closed or not.</p> <p>14 Q. Okay. But my client was let into the room by</p> <p>15 you?</p> <p>16 A. Correct.</p> <p>17 Q. Was anyone else summoned at this point to join</p> <p>18 you?</p> <p>19 A. Yes. When we were walking on the way back to</p> <p>20 the private screening room, TSO Michellin Jacobs crossed</p> <p>21 paths with me. And I asked if she was in a rotation or</p> <p>22 if she was free.</p> <p>23 She indicated that she was not in rotation,</p> <p>24 and she was free. And I asked if she would do a</p> <p>25 private screening with me.</p>

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<p>1 Q. Why did you ask for assistance with the private 2 screening? 3 A. The -- well, that's SSI. It's in the SOP. 4 Q. Does TSA procedure require two -- sorry. 5 Scratch that. 6 Ms. Smith, do you have an objection to that? 7 MS. SMITH: Yeah. I think it is SSI 8 because you're asking again about the procedure. So 9 I'll instruct her not to answer. 10 MR. CORBETT: Thank you. 11 BY MR. CORBETT: 12 Q. Ms. Serrano, is it TSA policy that in a private 13 room, there should be two or more screeners? 14 MS. SMITH: And I'll object again. SSI. 15 And I'll instruct her not to answer. 16 BY MR. CORBETT: 17 Q. So do I have it correct, then, that you, 18 Ms. Serrano, and Ms. Jacobs, and my client entered the 19 private room together at approximately the same time? 20 A. Correct. 21 Q. And then you closed the door behind the group? 22 A. Correct. 23 Q. Did Ms. Jacobs, in any way, participate in the 24 screening of my client other than acting as, essentially, 25 a witness?</p>	<p>1 Q. Okay. Approximately how tall are the walls on 2 this room? 3 A. I would guess maybe 7 feet tall. 4 Q. And is it fair to say there are very high 5 ceilings in this area? 6 A. In that area, on the checkpoint, yes. There are 7 very high ceilings. There's no second floor above, to my 8 knowledge. 9 Q. So the cameras are mounted more than 20 feet in 10 the air, would you say? 11 A. Yes. 12 Q. More than 40 feet in the air? 13 A. I don't know 40 feet when I see it. 14 Q. And these temporary walls have a built-in door 15 of some kind, I take it? 16 A. Yes. A metal framed door with frosted glass or 17 frosted plexi or whatever they use. 18 Q. What happened next once you were inside and the 19 door was closed? 20 A. I set her property -- there's a table in there. 21 Like a long stainless steel table like you would find in 22 a bakery or in a restaurant. So I put her two bins on 23 the table. And I -- I believe I changed my gloves at 24 that point. I think took off the gloves I was wearing 25 and grabbed a pair of fresh gloves from a box.</p>
Page 47	Page 49
<p>1 A. No. 2 Q. She never touched my client? 3 A. No. 4 Q. Did she ever speak to my client in front of you? 5 A. Not that I'm -- no. I don't think so. 6 Q. Are there any cameras in the private room, to 7 the best of your knowledge? 8 A. The cameras on the checkpoint are mounted on the 9 ceiling. 10 Q. Can they see in the private room? 11 A. I don't know. 12 Q. As far as you're aware, in the private room 13 itself, is there a ceiling mounted camera? 14 A. There's no ceiling -- there's no lid on the 15 room. So it's four open walls, and it's open on top. 16 There's no ceiling in the private screening room. It's 17 an open top room. 18 Q. Got it. So is it some kind of dividers that are 19 put into like a group of four walls or is it permanent 20 walls or can you describe more the -- 21 A. They are temporary. It's like temporary walls 22 that are like a metal frame with frosted glass and for, 23 you know, to make -- well, I guess there would only be 24 three panels because it's pushed up against an exterior 25 wall.</p>	<p>1 And I asked Ms. Leuthauser if she would step 2 on the yellow footprints on the mat. 3 Q. Okay. So there's some kind of floor mat on the 4 ground that has footprints on it. Is that your 5 testimony? 6 A. That's correct. 7 Q. What is the purpose of this floor mat? 8 A. It's utilized during pat-downs to -- as a 9 reference point for getting the passenger in the correct 10 stance to perform the pat-down. 11 Q. Did you advise my client to place her feet on 12 the footprints of the floor mat? 13 A. I did. 14 Q. At any point, did you advise her to spread her 15 feet wider? 16 A. No. 17 Q. Do you remember what my client was wearing? 18 A. I do not. 19 Q. After my client was standing on the mat, what 20 happened next? 21 A. I began to provide her with the advisements, 22 which is telling her what -- where she has alarmed, where 23 the anomaly was, and what I was going to be doing to -- 24 in order to clear that alarm. 25 Q. And can you describe -- or can you repeat for us</p>

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14 (Pages 50 to 53)

<p style="text-align: right;">Page 50</p> <p>1 what you told her you were going to be doing?</p> <p>2 A. I can.</p> <p>3 So I said, You've alarmed in the groin area.</p> <p>4 So I'm going to be patting down from your waistband to</p> <p>5 your knees, front and back. I'm going to use my</p> <p>6 fingers in a pinching motion and slide around your</p> <p>7 waistband from seam to seam. I'm going to use the back</p> <p>8 of my hand -- and as I'm pantomiming this to you, sir,</p> <p>9 now, the way I pantomime out in front of us so that</p> <p>10 they can see the motion if there's any language barrier</p> <p>11 or any other reason that a pantomime would be helpful.</p> <p>12 So I said, I'm going to be sliding my</p> <p>13 fingertips around your waistband. I'm going to use the</p> <p>14 back of my hands to clear your buttocks in an up and</p> <p>15 down motion. I'm going to use the back of my hands on</p> <p>16 your groin in a side to side and then up and down</p> <p>17 motion.</p> <p>18 In order to clear your legs, I'll place one</p> <p>19 hand on your hip, one hand on your thigh, the inside</p> <p>20 hand goes up until it meets resistance of the torso.</p> <p>21 Then both hands go all the way down to the knee. And</p> <p>22 I'll repeat that on both legs, front and back.</p> <p>23 I then -- well, I wasn't able to get those</p> <p>24 advisements out the first time. So I attempted to</p> <p>25 deliver those advisements multiple times.</p>	<p style="text-align: right;">Page 52</p> <p>1 BY MR. CORBETT:</p> <p>2 Q. And I take it that you told her no?</p> <p>3 A. That's correct. I told her that this is the way</p> <p>4 that this alarm needs to be cleared, and that I -- and I</p> <p>5 persisted in trying to get the words out of my mouth of</p> <p>6 what was going -- what the pat-down consisted of.</p> <p>7 Q. Did you eventually complete your advisements</p> <p>8 with my client?</p> <p>9 A. I did. When I eventually got through the</p> <p>10 pantomime portion and the description of how I was to be</p> <p>11 conducting the pat-down screening, I asked her if she had</p> <p>12 any medical devices which -- that I might feel. She said</p> <p>13 no.</p> <p>14 Typically, at this point is when you would ask</p> <p>15 in those advisements, Would you like a private</p> <p>16 screening? Although, obviously, I skipped it, because</p> <p>17 to my knowledge, the private screening had already been</p> <p>18 requested and affirmed by the passenger.</p> <p>19 And I asked if there is anything sore,</p> <p>20 sensitive, or painful to the touch that I should know</p> <p>21 about. And she replied to all three of those</p> <p>22 questions, medical devices -- I guess I didn't ask the</p> <p>23 private screening -- medical devices and anything</p> <p>24 painful, sore, or sensitive to the touch, in the</p> <p>25 negative.</p>
<p style="text-align: right;">Page 51</p> <p>1 Q. What happened that interrupted?</p> <p>2 A. The passenger was interrupting. She was waving</p> <p>3 her hand and saying, Just do it, just do it, just do it</p> <p>4 already. I have a plane to catch. I just want to get</p> <p>5 out of here. I don't want to do this. Just let me go.</p> <p>6 Put me in the machine again. Scan me again. I don't</p> <p>7 have anything there. Just do it already. I don't need</p> <p>8 to hear all of this.</p> <p>9 There was a number of complaints about</p> <p>10 getting -- proceeding with the process, getting it over</p> <p>11 with, just doing it. And she offered suggestions for</p> <p>12 other ways that I might be able to screen her.</p> <p>13 Q. Okay. So am I hearing two different kind of</p> <p>14 categories in the complaint? The first being that she</p> <p>15 was in a rush, and the second, was there some objection</p> <p>16 to this -- the screening that you proposed?</p> <p>17 A. Yes. There was --</p> <p>18 MS. SMITH: I'll object to the form of</p> <p>19 the question.</p> <p>20 Compound. Go ahead, Anita. Sorry.</p> <p>21 THE WITNESS: Her objection to the</p> <p>22 screening process was that she wasn't hiding anything</p> <p>23 and should not be submitted to a pat-down screen and</p> <p>24 was asking if she can be placed back inside the body</p> <p>25 scanner to try again.</p>	<p style="text-align: right;">Page 53</p> <p>1 Q. I'm still a little bit confused here regarding</p> <p>2 whether my client was taken to private screening because</p> <p>3 she asked to be taken to private screening or because</p> <p>4 private screening was required in this situation. Can</p> <p>5 you clarify?</p> <p>6 A. To the best of my knowledge, it was because she</p> <p>7 had asked for a private screening. The advisements that</p> <p>8 I just iterated to you are the same advisements that</p> <p>9 would have been conducted when she stepped out of the</p> <p>10 body scanner machine.</p> <p>11 Identical advisements. You've alarmed in the</p> <p>12 groin area. I will be patting down this area. Do you</p> <p>13 have any medical devices, anything sore, sensitive, or</p> <p>14 painful to the touch, and would you like a private</p> <p>15 screening?</p> <p>16 Q. Do you know which TSA screener would have</p> <p>17 provided her those advisements that is, I guess, the</p> <p>18 operator of the AIT?</p> <p>19 A. I believe her name is TSO Melicia Griffin. And</p> <p>20 I think she has a hyphenated last name, so I don't know</p> <p>21 if it's something-Griffin or Griffin-something.</p> <p>22 Q. Thank you. So to be perfectly clear, my client</p> <p>23 was not required to go to the private room. This was a</p> <p>24 pat-down that could have been conducted at the</p> <p>25 checkpoint?</p>

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15 (Pages 54 to 57)

<p style="text-align: right;">Page 54</p> <p>1 A. Correct.</p> <p>2 Q. Okay. After you finished your advisement, what</p> <p>3 happened next?</p> <p>4 A. I stepped -- I asked -- again, I asked for -- it</p> <p>5 was at least a second time. I believe I had asked at</p> <p>6 some point during the advisements that -- or mentioned</p> <p>7 that in order to clear the legs, I needed her to place</p> <p>8 herself on the footprints on the mat.</p> <p>9 But I asked again before I started the</p> <p>10 pat-down, Can you please place your feet -- take a</p> <p>11 wider stance. Place your feet on the yellow</p> <p>12 footprints.</p> <p>13 She, again, did not acknowledge that request</p> <p>14 or make an attempt to adjust her stance.</p> <p>15 Q. I think I asked earlier if you had ever told my</p> <p>16 client that she needed to spread her feet apart wider.</p> <p>17 And your answer was no. But you're now saying that at</p> <p>18 some point, you did ask her to spread her feet wider?</p> <p>19 A. No. I never said the words "Spread your feet</p> <p>20 wider." I have never said that during a pat-down, nor</p> <p>21 would I ever.</p> <p>22 I asked her to widen her stance.</p> <p>23 Q. Ms. Serrano, surely you must understand that in</p> <p>24 order to widen one's stance, once must move one's feet</p> <p>25 further apart; is that right?</p>	<p style="text-align: right;">Page 56</p> <p>1 footprints. I asked her to, Widen your stance and step</p> <p>2 on the footprints.</p> <p>3 So my request was not to take a stance wider</p> <p>4 than the footprints. My request had been so far to</p> <p>5 that point and throughout, to step on the footprints.</p> <p>6 Q. Okay. So I'm just trying to make sure that I</p> <p>7 get this --</p> <p>8 A. Had she stepped on -- directly on the</p> <p>9 footprints, then I would have been satisfied with her</p> <p>10 positioning in order to complete a targeted pat-down</p> <p>11 search.</p> <p>12 Q. Okay. So before you told her to widen her</p> <p>13 stance, she was on the mat, just not on the footprints?</p> <p>14 A. Correct. Her feet were narrower than the</p> <p>15 footprints.</p> <p>16 Q. Okay. And she -- you then asked her to widen</p> <p>17 her stance. Correct?</p> <p>18 A. Correct.</p> <p>19 Q. Did she widen them to the footprints or wider</p> <p>20 than the footprints?</p> <p>21 A. She did not adjust her stance from when she</p> <p>22 first stepped into the private screening room.</p> <p>23 Q. Did you then proceed with the pat-down or did</p> <p>24 you ask again or what happened next?</p> <p>25 A. I asked a number of times and with no -- no --</p>
<p style="text-align: right;">Page 55</p> <p>1 A. I do understand.</p> <p>2 MS. SMITH: Form. Argumentative.</p> <p>3 BY MR. CORBETT:</p> <p>4 Q. Thank you. So to clarify, you did ask my client</p> <p>5 to widen her feet while she was on this footprint mat?</p> <p>6 A. I asked her to widen her stance. Yes.</p> <p>7 Q. Did you ask her to widen her stance such that it</p> <p>8 would be wider than the footprints would have dictated?</p> <p>9 A. I believe I -- so I -- hmm. The proper stance</p> <p>10 is part of the procedure, the yellow footprints on the</p> <p>11 mat are a starting point.</p> <p>12 The procedure defines where -- how a person's</p> <p>13 feet need to be placed in relation to the rest of their</p> <p>14 own body. And, of course, since people are taller and</p> <p>15 some people are shorter, those footprints are a</p> <p>16 starting point.</p> <p>17 However, the -- it's at liberty of the officer</p> <p>18 to accomplish the specifics of the position required</p> <p>19 for a pat-down, and that may require wider -- a wider</p> <p>20 stance than the footprints indicate.</p> <p>21 Q. So is the answer to my question, then, yes, you</p> <p>22 did ask her to move her -- to widen her stance wider than</p> <p>23 the footprints would have indicated?</p> <p>24 A. I asked her to step on the footprints. I did</p> <p>25 not ask her to widen her stance wider than the</p>	<p style="text-align: right;">Page 57</p> <p>1 again, no acknowledgement of my request or any attempt to</p> <p>2 step on the footprints. So I began the pat-down along</p> <p>3 her waistband.</p> <p>4 Q. When you began the pat-down then, you were</p> <p>5 saying her feet were narrower than the footprints?</p> <p>6 A. That is correct.</p> <p>7 Q. Was this frustrating for you?</p> <p>8 A. It was.</p> <p>9 Q. You say you started your search of my client</p> <p>10 with a waistband check; was that correct?</p> <p>11 A. That's correct.</p> <p>12 Q. Was there anything out of the ordinary found in</p> <p>13 my client's waistband?</p> <p>14 A. No.</p> <p>15 Q. Were you able to search my client's waistband as</p> <p>16 necessary without first interruption?</p> <p>17 A. Yes. I screened the waistband. Yes.</p> <p>18 Q. What happened next?</p> <p>19 A. Then I screened her buttock area. So I used --</p> <p>20 with my fingertips touching like this, used the flat of</p> <p>21 the back of my hands, starting from one seam of the</p> <p>22 pants. I went in a vertical motion using an overlapping</p> <p>23 motion following the contour of the body from seam to</p> <p>24 seam.</p> <p>25 Q. So, at this point, my client was facing away</p>

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16 (Pages 58 to 61)

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<p>1 from you; is that correct?</p> <p>2 A. That's correct. This was conducted from behind</p> <p>3 her. I believe I took a knee when I began -- when I</p> <p>4 began the targeted pat-down.</p> <p>5 Q. Would you say my client is of average height?</p> <p>6 Taller than average height?</p> <p>7 A. Like I said before, when you asked for her to --</p> <p>8 me to describe her, I would say that she is taller than</p> <p>9 me. And I am of below -- what I would consider below</p> <p>10 average height.</p> <p>11 Q. So would you consider her of average height,</p> <p>12 approximately?</p> <p>13 (Speaking Simultaneously.)</p> <p>14 THE WITNESS: Yeah. As best as I can</p> <p>15 recall.</p> <p>16 THE COURT REPORTER: I didn't hear the</p> <p>17 objection.</p> <p>18 MS. SMITH: I objected to the form.</p> <p>19 Sorry. Anita is real quick here.</p> <p>20 THE WITNESS: Sorry.</p> <p>21 MS. SMITH: It's okay.</p> <p>22 BY MR. CORBETT:</p> <p>23 Q. The screening of her buttock area, were you able</p> <p>24 to complete that successfully?</p> <p>25 A. Yes.</p>	<p>1 Q. Let's go for both.</p> <p>2 A. As per the advisements, like I said, inside hand</p> <p>3 goes up until it meets resistance of the torso.</p> <p>4 So when I meet the resistance of the torso,</p> <p>5 where the torso meets the leg, that's my stopping</p> <p>6 point. Because I'm trying to clear the thigh. So in</p> <p>7 order to clear the entire thigh, I go up until I meet</p> <p>8 resistance of the torso, and then that hand is brought</p> <p>9 back down to the knee.</p> <p>10 Q. Okay. And in this particular case?</p> <p>11 A. The -- her legs were touching. Her thighs were</p> <p>12 sort of, I guess, pressed together. So when I brought</p> <p>13 that inside hand up the thigh instead of reaching the</p> <p>14 resistance of the torso, I met resistance of her other</p> <p>15 leg.</p> <p>16 Q. So you're saying her legs were so narrow --</p> <p>17 A. Her thighs were touching.</p> <p>18 Q. -- that her thighs were touching and you were</p> <p>19 unable to screen?</p> <p>20 A. Correct.</p> <p>21 Q. Just as a point of clarity regarding anatomy.</p> <p>22 Would you say that your genitals are a part of your</p> <p>23 torso?</p> <p>24 A. Yes. I would say that.</p> <p>25 Q. Okay. Thank you.</p>
Page 59	Page 61
<p>1 Q. Did my client make any further objections during</p> <p>2 that screening?</p> <p>3 A. No.</p> <p>4 Q. What happened next?</p> <p>5 A. I asked -- before I began to try to attempt to</p> <p>6 clear the legs, I asked her again if she can widen her</p> <p>7 stance. She did not acknowledge my request or attempt to</p> <p>8 widen her stance.</p> <p>9 I placed one hand on her hip. My left hand on</p> <p>10 her left hip. My right hand on her left thigh about I</p> <p>11 would say halfway between the groin and the knee. I</p> <p>12 brought my -- that inside hand up until it met the</p> <p>13 resistance where her legs were touching. And I stopped</p> <p>14 and sort of leaned -- I mean, I don't mean to go off</p> <p>15 camera here.</p> <p>16 But I said to sort of lean over, and I asked</p> <p>17 her again, Will you please widen your stance so that I</p> <p>18 can clear your legs? There are --</p> <p>19 Q. Sorry. Were you finished with your answer?</p> <p>20 A. I am.</p> <p>21 Q. To be clear, you speak of moving your hand up</p> <p>22 until you meet resistance. Anatomically what part of the</p> <p>23 body have you reached when you meet resistance?</p> <p>24 A. Which part did I reach on this occasion or</p> <p>25 which -- what am I anatomically hoping to reach?</p>	<p>1 So it seems like what I'm saying is -- what</p> <p>2 I'm hearing is that at this point, you were unable to</p> <p>3 complete that part of the pat-down to the point where</p> <p>4 you were supposed to; is that correct?</p> <p>5 A. That's correct.</p> <p>6 Q. What did you do next?</p> <p>7 A. I -- as I said, I leaned around and asked for</p> <p>8 her to take a wider stance so that I may complete the</p> <p>9 screening on her leg. There was not a response. So I</p> <p>10 stood, and I -- my goal was to come around to the front</p> <p>11 and again pantomime the screening of the legs and explain</p> <p>12 that I need to have the ability to bring that inside hand</p> <p>13 up until it meets resistance of the torso with the</p> <p>14 pantomime to show, you know, sort of what I'm trying to</p> <p>15 achieve here.</p> <p>16 As I was on my way up off of my knee and</p> <p>17 coming around to the front, then the passenger said,</p> <p>18 I've just been raped.</p> <p>19 Q. Okay. Up until this point, TSO Jacobs had not</p> <p>20 said anything to you or to the client? Had remained</p> <p>21 completely silent. Correct?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. After my client said that she had been</p> <p>24 raped, according to you, what happened next?</p> <p>25 A. I stopped the pat-down -- well, I looked at</p>

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17 (Pages 62 to 65)

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1 TSO Jacobs, and I said, I'll be right back. And I
 2 grabbed my radio -- so I stopped -- I stopped attempting
 3 to explain the advisements again. I discontinued the
 4 pat-down at that point, and I grabbed my radio off of my
 5 belt and I left the private screening room, leaving the
 6 door open.
 7 Q. Okay. And leaving TSO Jacobs and my client
 8 inside?
 9 A. Correct.
 10 Q. What was the purpose of leaving the room and
 11 grabbing the radio?
 12 A. I called on the radio. I said, I need a female
 13 to the private screening room.
 14 Q. Okay. And to go back a little bit, so you are
 15 saying that you never reached higher than part of the way
 16 up my client's thigh? You never, at any point, made
 17 contact with her vulva, her labia, or any genital area;
 18 is that correct?
 19 A. That's correct.
 20 Q. You called for assistance over the radio, and
 21 what happened?
 22 A. I -- I believe that a -- honestly, I believe
 23 this a male answered and said something affirming. And I
 24 said, I need a female to the private screening room.
 25 And then STSO Brionnes approached and asked,

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1 A. Okay.
 2 Q. So you can do your best to just describe in
 3 words.
 4 A. Okay.
 5 Q. I appreciate being able to see it.
 6 A. Okay.
 7 Q. But do the best you can do for the record,
 8 please.
 9 A. So Ms. Leuthauser interrupted STSO Brionnes'
 10 advisements. And she pointed her index finger at my face
 11 with her arm extended and elbow locked, and she said very
 12 loudly, I want her out. And then she put her arm down.
 13 So STSO Brionnes looked at me and said, It's
 14 okay. I got it. And I didn't say anything. I just
 15 left the room and shut the door behind me.
 16 Q. Okay. Did you have any further interaction with
 17 my client that day?
 18 A. No.
 19 Q. Have you had any further interaction with my
 20 client since?
 21 A. No.
 22 Q. I'm going to take from you a description of the
 23 other three TSA employees, starting with STSO Brionnes.
 24 Can you describe her physically?
 25 A. I would say she's approximately my height.

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1 What's up? I said, There is a passenger here who has
 2 alarmed in the groin area. She's refusing to take the
 3 proper stance. I can't complete the pat-down. It took
 4 me a long time just to get the advisements out.
 5 I said I was able to pat-down the waistband
 6 and the buttocks with no further cause for alarm. I'm
 7 unable to clear her legs. Because her stance is too
 8 narrow. And she said, Okay. So we went -- her and
 9 I -- STSO Brionnes and myself went back into the
 10 private screening room and shut the door.
 11 Q. Okay. So now there are three TSA employees and
 12 my client in the room with the door closed?
 13 A. Correct.
 14 Q. What happened next?
 15 A. The STSO Brionnes began giving the same
 16 advisements that I did, which were, you know, You have
 17 alarmed in the groin area. In order to clear the alarm,
 18 you will be patted down from the waistband to the knees,
 19 and so on.
 20 Partway through those advisements, your client
 21 sort of stopped. She raised her voice. She put her
 22 hand -- I don't know if I can just point at the camera,
 23 but she extended her hand like this.
 24 Q. This is going to be reduced into a writing, into
 25 written testimony.

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1 Maybe even a little bit shorter. So between 5-foot and
 2 5-foot-3. She -- excuse me -- is Hispanic, has light
 3 skin. Light colored skin. And I would describe her as
 4 overweight.
 5 TSO Jacobs is, I would say, about -- pretty --
 6 very similar to me physically. Sort of an average
 7 build. A little on the shorter side. Probably about
 8 the same height. 5-2, 5-3. She's African-American and
 9 has fairly dark skin.
 10 Q. Okay. And TSO Griffin?
 11 A. She is African-American. Maybe a slightly more
 12 slender -- maybe slightly more slender build. I don't
 13 know. I would say average height for a woman, maybe 5-5.
 14 Q. Okay. And all three of these people are female.
 15 Correct?
 16 A. Correct.
 17 Q. Can you just give me approximate ages for each?
 18 A. Oh, I think STSO Brionnes is probably in her
 19 40s. But I really don't know. I mean --
 20 Q. That's fine. Approximate is okay.
 21 A. Yeah. I would say in her 40s. TSO Jacobs is a
 22 little younger, probably in her 20s. Maybe late 20s.
 23 And Melicia -- is it Griffin or Griffith? Griffin?
 24 Q. I don't know.
 25 A. TSO Griffin, I don't know, jeez. I don't know.

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18 (Pages 66 to 69)

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1 She looks -- she looks great. I wouldn't be surprised if
 2 she said she was 50, and I wouldn't be surprised if she
 3 said she was 28. So I would say let's -- let's average,
 4 she's in her 30s.
 5 Q. Okay. And I don't think I actually got your
 6 age. How old are you?
 7 A. I'm 38. And I did provide that.
 8 Q. Oh, thank you. Sorry.
 9 Okay. Did you speak with your supervisor
 10 about the incidents subsequently that day?
 11 A. With my supervisor? No. I did not.
 12 Q. I think I'm actually asking more about
 13 STSO Brionnes. Did you speak with her?
 14 A. Oh, yes. I -- when Ms. Leuthauser left -- so
 15 when I exited the private screening room, I went about my
 16 duties, my LTSO duties.
 17 When Ms. Leuthauser exited the private
 18 screening room, I asked -- and STSO Brionnes came out.
 19 I asked her, I said, Is everything okay? And she said,
 20 Yeah. She said, I was able to -- I was finally able to
 21 finish the pat-down with no other alarms. But she kept
 22 asking me, Have you ever been raped? Have you ever
 23 been raped?
 24 And I said, God, please tell me that you
 25 didn't answer that question. What does that have to

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1 they guilty or not guilty?
 2 So what we do at the airport is we clear
 3 alarms. We do not clear the person. We clear the
 4 alarm. So to the best of my knowledge, the alarm was
 5 successfully cleared.
 6 Q. Well, I understand and I appreciate your
 7 analogy. A passenger who has not yet started the
 8 screening process who is perhaps in line for the travel
 9 document checker, has not been cleared. You would say
 10 that's an accurate statement. Correct?
 11 A. There is -- there are no -- TSA doesn't have
 12 jurisdiction until they begin -- until the screening
 13 process has begun.
 14 Q. Okay. So --
 15 A. So it doesn't -- if somebody approaches a
 16 checkpoint, and they have not begun the screening
 17 process, they can have whatever they have. There
 18 aren't -- doesn't meet the definition of a prohibited
 19 item until the screening process has begun.
 20 Q. So a person who was just handed their ID and
 21 their boarding pass to the travel document checker and
 22 been told to continue on to put their baggage onto the
 23 X-ray conveyor belt, is it fair to describe that person
 24 as a passenger who has not been cleared?
 25 A. There's -- well, like I -- like I said, I

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1 do, your experience, what does that have to do with
 2 screening at all? Please tell me you did not answer
 3 that question.
 4 And she said, Yes, I did. I told her that I
 5 hadn't. And she said, But she was -- she was really
 6 upset, and it took a long time to finish. But I
 7 finished it, and there were no other alarms or
 8 anomalies.
 9 Q. Okay. So to the best of your knowledge, there
 10 were no items of any kind found on my client's person?
 11 A. I didn't ask about any objects or items of any
 12 kind. She said there were no longer -- no other alarms
 13 or anomalies.
 14 Q. But she did not mention finding any objects?
 15 A. She didn't mention either way, other than she
 16 didn't say there were any -- she said there were no other
 17 alarms.
 18 Q. So the supervisor cleared my client and allowed
 19 her to leave the checkpoint; is that correct?
 20 A. No. She cleared the alarms.
 21 Q. Was my client not clear after the alarms were
 22 cleared?
 23 A. We're sort of getting into semantics here. I
 24 would liken it to when you're in a courtroom and you're
 25 not asking, Is my client innocent? You're asking, Are

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1 understand where you're driving at, and I understand that
 2 it is semantics. We don't clear passengers, we clear
 3 alarms. So there is no designation of this passenger is
 4 clear or not clear. It's, Were the alarms clear or not
 5 cleared?
 6 Q. Is it true that my client was not allowed to
 7 touch her personal belongings until the pat-down had been
 8 concluded and all alarms had been concluded?
 9 A. That is correct.
 10 Q. And you would not use -- you would not say that
 11 the passenger needs to wait until they are cleared in
 12 order to touch their luggage? You would say that the
 13 passenger must wait until all of their alarms are
 14 cleared?
 15 A. I don't know that I have ever had instance to
 16 make that designation verbally to a passenger.
 17 Q. If you saw a passenger standing about the
 18 checkpoint, let's say very close to the AIT, just past
 19 it, and you were unsure if this person was waiting for a
 20 pat-down or not and you wanted to ask this person's
 21 status, would it not be fair to ask if this person has
 22 been cleared or still waiting? You would instead ask if
 23 there is some kind of alarm pending?
 24 MS. SMITH: I'll object to the form.
 25 ///

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19 (Pages 70 to 73)

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<p>1 BY MR. CORBETT:</p> <p>2 Q. I'll retract that.</p> <p>3 My question is: I'm -- maybe semantical, but</p> <p>4 how does TSA refer to passengers who have passed</p> <p>5 through security?</p> <p>6 A. They -- just a passenger. I don't know that</p> <p>7 there is any designation for a passenger who -- I don't</p> <p>8 know -- I'm not aware of any instance where we're</p> <p>9 describing a group of individuals as these are people who</p> <p>10 are clear and people who are not.</p> <p>11 It would be described more as where is their</p> <p>12 location in the airport? If they are on the secure</p> <p>13 side, that means that their property and their person</p> <p>14 have submitted to screening and all alarms were clear,</p> <p>15 you know -- were cleared or there were not any alarms</p> <p>16 present, and they have moved into the secure area of</p> <p>17 the airport.</p> <p>18 Q. Okay. Has a passenger ever filed a complaint</p> <p>19 against you regarding your work with the TSA other than</p> <p>20 my client?</p> <p>21 A. Not that I'm aware of.</p> <p>22 Q. When was the first time that you heard that a</p> <p>23 complaint had been filed or an issue had been raised</p> <p>24 about this pat-down after your speaking with</p> <p>25 STSO Brionnes right after the pat-down had been</p>	<p>1 (Speaking Simultaneously.)</p> <p>2 MR. CORBETT: -- way as possible.</p> <p>3 BY MR. CORBETT:</p> <p>4 Q. Based on your training, does TSA policy ever</p> <p>5 allow a screener to press her fingers between the labia</p> <p>6 of a passenger?</p> <p>7 MS. SMITH: Krista, can I -- are you</p> <p>8 there?</p> <p>9 I'm sorry. I'm freezing.</p> <p>10 MS. MAIZEL: I am here.</p> <p>11 MS. SMITH: I just wasn't sure that --</p> <p>12 I'm not sure if that's SSI.</p> <p>13 Can you tell me if you find that that is?</p> <p>14 MS. MAIZEL: I believe it is because he</p> <p>15 is asking about the contents of the training.</p> <p>16 MS. SMITH: Okay. All right. I'll</p> <p>17 object on the ground of SSI and instruct her not to</p> <p>18 answer. There probably is a way to ask it.</p> <p>19 BY MR. CORBETT:</p> <p>20 Q. Does TSA procedure ever allow for a body cavity</p> <p>21 search?</p> <p>22 A. Again, you're asking me specific questions about</p> <p>23 the standard operating procedure, which has been</p> <p>24 designated as SSI.</p> <p>25 MR. CORBETT: Ms. Smith.</p>
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<p>1 completed?</p> <p>2 A. It was probably July 20-something. It was after</p> <p>3 I had transferred to a different airport. And I was</p> <p>4 asked by an LTSO, by a lead -- a lead to complete a</p> <p>5 statement.</p> <p>6 Q. Okay. So approximately one or two months later?</p> <p>7 A. Less than one month. Or one month. Yeah.</p> <p>8 About one month later.</p> <p>9 Q. Is it fair to say that you have such a clear</p> <p>10 recollection of this pat-down because it was unusual for</p> <p>11 a client to start speaking of rape in the middle of their</p> <p>12 pat-down?</p> <p>13 A. Yes. That was unusual. And I do think that</p> <p>14 that has something to do with it marking in my memory.</p> <p>15 Q. Based on your training, is a TSA screener ever</p> <p>16 allowed to press her hand between the labia of a</p> <p>17 passenger during a pat-down search?</p> <p>18 A. The content of our training is SSI.</p> <p>19 MR. CORBETT: Ms. Smith?</p> <p>20 MS. SMITH: I'm sorry. I -- you were</p> <p>21 breaking up, and I didn't catch the whole entire</p> <p>22 question. I'd like to hear it again.</p> <p>23 MR. CORBETT: Certainly, I'll say it</p> <p>24 again, and I'm trying to phrase this, Ms. Smith, in --</p> <p>25 MS. SMITH: Yeah. I know.</p>	<p>1 MS. SMITH: Same objection.</p> <p>2 MR. CORBETT: Ms. Smith, I'm fairly sure</p> <p>3 that TSA publicly states that they do not conduct</p> <p>4 searches in this manner.</p> <p>5 I don't think that this is so intrusive as to</p> <p>6 the TSA's methods as to become SSI. Are you certain</p> <p>7 that you want to take an objection here?</p> <p>8 MS. SMITH: Well, I'd like to confer with</p> <p>9 Krista. I definitely don't want to, you know, assert</p> <p>10 something that shouldn't be. So -- but you are asking</p> <p>11 about the procedure, and I think that's part of the</p> <p>12 trouble here.</p> <p>13 MR. CORBETT: Okay. If we can take a</p> <p>14 five-minute break now.</p> <p>15 I'll just advise that the next question is</p> <p>16 going to be as the same question but with strip searches</p> <p>17 rather than body cavity searches.</p> <p>18 So if you could confer during that time.</p> <p>19 MS. SMITH: Yeah. That would be nice.</p> <p>20 MR. CORBETT: We can reconvene at 11:20.</p> <p>21 Does that work?</p> <p>22 MS. SMITH: Yes. That's fine.</p> <p>23 MR. CORBETT: Thank you very much.</p> <p>24 MS. SMITH: Thank you. We will take a</p> <p>25 break.</p>

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20 (Pages 74 to 77)

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1 (Brief Recess.)

2 BY MR. CORBETT:

3 Q. Again, just a reminder, you're under oath from
4 before. The question we left off with was -- I'm going
5 to modify it -- is a body cavity search ever a part of
6 TSA procedures?

7 A. No.

8 Q. Is a strip search, having a passenger remove
9 inner clothing, ever a part of TSA procedures?

10 A. Inner clothing? No. Outerwear, perhaps.

11 Q. Pants?

12 A. No.

13 Q. Okay. So by outerwear, do you mean jackets and
14 sweaters?

15 A. Jackets and sweaters. Absolutely.

16 Q. Okay. I just had one follow-up question from
17 earlier. Why did you choose to become a TSA screener?18 A. A big part of it was after I got out of the
19 Marine Corps, I really wanted a job where I felt a sense
20 of camaraderie, being a part of something bigger than
21 myself. And, honestly, the benefits of government
22 employment, the health care benefits are excellent.

23 Q. Did you find that camaraderie in the TSA?

24 A. I did.

25 Q. Just briefly, how long did you serve in the

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1 attachment to an e-mail. Never in the text of an e-mail
2 and never without a password.3 So to the extent we are circulating this, if we
4 could please use a password-protected PDF format, that
5 would be great. And then I'll submit it for SSI review
6 and get it confirmed one way or the other that it does
7 or does not have SSI.8 MR. CORBETT: Okay. Does the court
9 reporting company have the technical means to send in a
10 password-protected ZIP file or something along the
11 lines?12 ZOOM HOST: I believe so, and I'll
13 reconfirm that with my office manager.14 MS. MAIZEL: Thank you. And I have sent
15 Ms. Smith a handling guideline sheet. If anyone has
16 additional questions, I'm always available to discuss
17 as well.

18 MS. SMITH: Thank you.

19 (The confidential remote videoconference
20 deposition concluded at 11:36 a.m.)

21 * * * * *

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1 United States military?

2 A. From 2006 to 2011.

3 Q. Were you honorably discharged?

4 A. I was.

5 MR. CORBETT: Thank you. I have no
6 further questions.

7 Ms. Smith, do you have any?

8 MS. SMITH: Let me just take a brief
9 one-minute break.

10 MR. CORBETT: Sure.

11 MS. SMITH: Thank you.

12 (Brief Recess.)

13 MS. SMITH: I don't have any questions
14 for you, Anita.15 We will take the transcript, read and sign it.
16 And then, Krista, I think there's something special we
17 have to do with the transcript. This is my first go at
18 it.19 MS. MAIZEL: Right. Although
20 definitively -- I can't speak definitively as to
21 whether or not the transcript does or does not contain
22 sensitive security information, it's a matter of course
23 for the agency to submit transcripts for review.24 There's a special way to handle SSI. The most
25 important one right now is in a password-protected

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1 CERTIFICATE OF DEPONENT
2 PAGE LINE CHANGE3 _____
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15 * * * * *

16 I, Anita Serrano, deponent herein, do hereby
17 certify and declare under penalty of perjury the within and
18 foregoing transcription to be my remote videoconference
19 deposition in said action; that I have read, corrected and
do hereby affix my signature to said deposition this _____
day of _____, 2021.20 _____
21 Anita Serrano, Deponent
22
23
24
25

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CERTIFICATE OF REPORTER

I, Cindy Magnussen, Certified Court Reporter,
State of Nevada, do hereby certify:

That I reported the confidential remote videoconference
deposition of Anita Serrano, commencing on Friday,
January 8, 2021, at 8:54 a.m.

That prior to being deposed, the witness was duly
sworn by me to testify to the truth. That I thereafter
transcribed my said shorthand notes into typewriting and
that the typewritten transcript is a complete, true and
accurate transcription of my said shorthand notes. That
prior to the conclusion of the proceedings, the reading and
signing was requested by the witness or a party.

I further certify that I am not a relative or
employee of counsel of any of the parties, nor a relative or
employee of the parties involved in said action, nor a
person financially interested in the action.

IN WITNESS WHEREOF, I have set my hand in my
office in the County of Clark, State of Nevada, this 21st
day of January, 2021.

CINDY MAGNUSSEN, RDR, CCR No. 650

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